

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.,

Defendant.

Civil Action No. 2:22-cv-00125-JRG



**DECLARATION OF PAUL MARGULIES IN SUPPORT OF
CHARTER COMMUNICATIONS, INC.'S OPPOSITION TO PLAINTIFF'S MOTION
FOR LEAVE TO SUPPLEMENT INFRINGEMENT CONTENTIONS**

I, Paul Margulies, declare as follows:

1. I am over 18 years of age and competent to make this declaration. If called to testify as a witness, I could and would testify truthfully under oath to each of the statements in the declaration. I make each statement below based on my personal knowledge or after investigation of the relevant information.

2. I am counsel at Arnold & Porter Kaye Scholer, LLP, counsel of record for Defendant, Charter Communications, Inc. (“Defendant”). I am licensed to practice law in the State of New York, the District of Columbia, and this Court.

3. I make this Declaration based on my personal knowledge and in support of Charter’s Opposition to Plaintiff Entropic Communications, LLC’s (“Entropic”) Motion For Leave To Supplement Infringement Contentions.

4. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from Exhibit 2 to the July 20, 2023 Deposition of CommScope, introduced by Plaintiff. This document was produced to Entropic on June 15, 2023.

5. Attached hereto as **Exhibit 2** is a true and correct copy of Exhibit B to Entropic’s June 23, 2023 Second Amended Infringement Contentions.

6. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from CHARTER_ENTROPIC00067870, a document produced by Charter in this litigation on January 13, 2023. Entropic questioned Charter’s Rule 30(b)(6) designee regarding this document at a deposition on May 31, 2023.

7. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the deposition of Charter witness Steven Williams, dated June 6, 2023.

8. Attached hereto as **Exhibit 5** is a true and is a true and correct copy of excerpts from the deposition of Charter witness William Berger, dated June 16, 2023.

9. Attached hereto as **Exhibit 6** is a true and is a true and correct copy of excerpts from the Expert Report of Shukri Sourì, Ph.D. regarding Infringement, submitted by Entropic Communications, LLC on July 21, 2023.

10. On or around July 18, 2023, Entropic requested that Defendant re-produce certain documents as color copies, including Exhibit 3 cited herein.

Executed on August 7, 2023 in Washington, D.C.

/s/ Paul Margulies

Paul Margulies

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via email and the Court's ECF system on August 7, 2023.

/s/ Paul Margulies

Paul Margulies

CERTIFICATE OF AUTHORIZATION TO FILE UNDER SEAL

Pursuant to Local Rule CV-5, the undersigned counsel hereby certifies that authorization for filing under seal has been previously granted by the Court in the Protective Order (Dkt. 36) entered in this case on August 10, 2022.

/s/ Paul Margulies

Paul Margulies